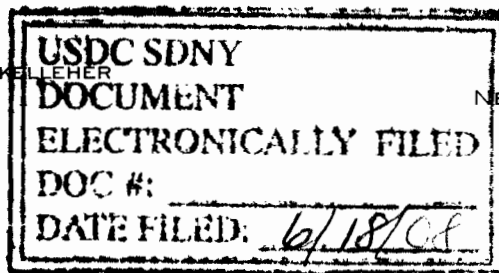


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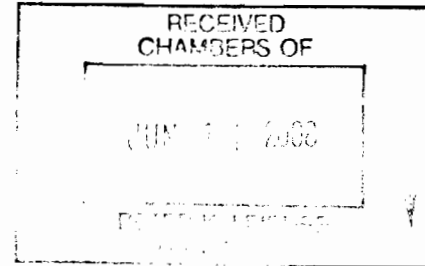
MEMO ENDORSED

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JOHN W. DUNNE
ADMITTED IN NY & CT



June 9, 2008

Hon. Peter K. Leisure
Senior United States District Court Judge
Southern District of New York
500 Pearl St., Room 1910
New York, NY 10007

Re: *Greenwich Life Settlements, Inc. v. ViaSource, LLC*
Case # 08-cv-03062

Dear Judge Leisure:

This office represents the defendant – ViaSource, LLC. All counsel recently appeared and a Civil Case Management Plan was entered. We also discussed ViaSource's desire to move to dismiss or for a change of venue based upon *forum non conveniens*. You directed I submit a letter requesting a pre-motion conference.

Pursuant to the complaint, Greenwich Life Settlements, Inc. is a Delaware corporation with its principal place of business in Greenwich, Connecticut, and Greenwich Settlements Master Trust is a Delaware Trust owned by Greenwich Life. Defendant – ViaSource – is a New Jersey LLC with its principal place of business in Bernhard Township, New Jersey. For reasons only known to Greenwich, it filed this action in the Supreme Court, New York County rather than state or federal court in New Jersey.

ViaSource removed the action to this court based upon diversity of citizenship. It now requests permission to move to dismiss or change venue based upon *forum non conveniens*. Dismissal and/or change of venue is appropriate under statutory and case law. 28 U.S.C. 1404(b) (1994); *PT United Can Co. Ltd. v. Crown Cork & Seal Co., Inc.*, 138 F.3d 65 (2d Cir. 1998).

In short, the relevant parties named and actions alleged in the complaint occurred in New Jersey; the witnesses reside and/or work in New Jersey, and ViaSource transacts the majority of its business in New Jersey. The complaint does not identify or allege any material actions that occurred in New York, nor does it demonstrate how or why a New Jersey LLC should be haled into a New York court. Accordingly, dismissal or a change

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of venue is appropriate, as New Jersey has a strong interest in adjudicating its own matters before its own tribunals.

Based upon the above, I respectfully request a pre-motion conference on ViaSource's anticipated motion to change venue.

For scheduling purposes, please be advised that I will be out of the country from June 19th to June 29th.

Respectfully submitted,



John W. Dunne (JD 2515)

Cc: Otterbourg, Steindler, Houston & Rosen, P.C.

A pre-motion conference
will be held on
July 17, 2008 at
11:00 a.m.

